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1	WHEREAS, on February 25, 2016, the Court entered Pretrial Order No. 9 (Dkt.		
2	1252), which, in Paragraph 4.D.ii, requires the parties to endeavor to substantially complete their		
3	productions of non-privileged, responsive documents by December 2, 2016;		
4	WHEREAS, Paragraph 4.D.ii of Pretrial Order No. 9 permits the parties to apply		
5	(jointly or separately) for an extension of this deadline for good cause shown;		
6	WHEREAS, the parties have made, and continue to make, good faith efforts to		
7	produce non-privileged, responsive documents to the other parties;		
8	WHEREAS, the parties believe that an extension of time to substantially complet		
9	production of non-privileged, responsive documents is necessary to, among other things, allow		
10	the parties time to continue discussing resolution of certain claims in this Action; and		
11	WHEREAS, each party reserves its right to apply to the Court for a further		
12	extension or extensions.		
13	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and		
14	among the parties, that the deadline for the parties to endeavor to substantially complete their		
15	productions of non-privileged, responsive documents should be continued to March 3, 2017.		
16	Dated: December 2, 2016 Respectfully submitted,		
17	By: <u>s/Bethany Engel</u>		
18	Joshua H. Van Eaton josh.van.eaton@usdoj.gov		
19	Bethany Engel bethany.engel@usdoj.gov		
20	Environmental Enforcement Section Environment and Natural Resources Division		
21	UNITED STATES DEPARTMENT OF JUSTICE		
22	P.O. Box 7611 Washington, DC 20044-7611		
23	Telephone: (202) 514-6892 Facsimile: (202) 616-2427		
24	Government Coordinating Counsel and Counsel		
25	for the United States		
26			
27			
28	-2-		

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1	Dated: December 2, 2016	Respectfully submitted,
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4		nelless@sullcrom.com William B. Monahan
5		monahanw@sullcrom.com John G. McCarthy
6		mccarthyj@sullcrom.com SULLIVAN & CROMWELL LLP
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8		Telephone: (212) 558-4000 Facsimile: (212) 558-3588
9		Co-Liaison Counsel for the Volkswagen Group
10		Defendants
11	Dated: December 2, 2016	Respectfully submitted,
12		By: <u>s/Jeffrey L. Chase</u>
13		Jeffrey L. Chase jchase@herzfeld-rubin.com
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17		Co-Liaison Counsel for the Volkswagen Group
18		Defendants
19	Dated: December 2, 2016	Respectfully submitted,
20		By: <u>s/ Cari K. Dawson</u>
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22		ALSTON & BIRD LLP One Atlantic Center
23		1201 West Peachtree Street Atlanta, Georgia 30309
24		Telephone: (404) 881-7766
25		Liaison Counsel for the Porsche Defendants
26		
27		
28		-3-
		STIDLILATION AND PROPOSED OPDED TO EXTEND DEADLINE FOR

Dated: December 2, 2016 Respectfully submitted, 1 By: s/Elizabeth J. Cabraser 2 Elizabeth J. Cabraser ecabraser@lchb.com 3 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 4 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 5 Telephone: 415.956.1000 Facsimile: 415.956.1008 6 Plaintiffs' Lead Counsel 7 8 Dated: December 2, 2016 Respectfully submitted, 9 By: *s/ Jonathan Cohen* 10 Jonathan Cohen jcohen2@ftc.gov 11 Michelle L. Schaeffer mschaefer@ftc.gov 12 Sangjoon "Simon" Han shan@ftc.gov 13 Megan A. Bartley mbartley@ftc.gov 14 FEDERAL TRADE COMMISSION 600 Pennsylvania Avenue NW, CC-9528 15 Washington, DC 20580 (202) 326-2551 (Cohen); -3515 (Schaefer); -2880 16 (Kostner); -2495 (Han); -3424 (Bartley); -3197 (fax) 17 Counsel for Plaintiff Federal Trade Commission 18 19 20 21 22 23 24 25 26 27 28 -4-

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1	Dated: December 2, 2016 Respec	ectfully submitted,
2 3	Zy.	s/Jon F. WormNicklas A. AkersSenior Assistant Attorney General
4	$4 \parallel$	Judith A. Fiorentini Supervising Deputy Attorney General
5	5	Jon F. Worm Deputy Attorney General
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8	8	jon.worm@doj.ca.gov
9	9	Attorneys for the People of the State of California
10	0 *	* *
11	PURSUANT TO STIPULA	TION, IT IS SO ORDERED.
12		
13	3 DATED: <u>December 2</u> , 2016.	
14	4	CHARLES R. BREYER United States District Judge
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